

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

Abdi Nazemian, et al.,  
Plaintiffs,

vs.

NVIDIA Corporation,  
Defendant.

Case No. 4:24-cv-01454-JST  
Case No. 4:24-cv-02655-JST

**JOINT STIPULATION AND ~~PROPOSED~~  
ORDER RE ESI PROTOCOL AND  
PROTECTIVE ORDER SCHEDULE**

Judge: Hon. Jon S. Tigar  
Courtroom: 6 - 2nd Floor

Andre Dubus III, et al.,  
Plaintiffs,

vs.

NVIDIA Corporation,  
Defendant.

Pursuant to Civil Local Rule 7-12 and the Court's Minute Entry for proceedings held on October 21, 2024, (ECF No. 80), the undersigned Parties to the above-captioned action, by and through their respective counsel of record, hereby stipulate the following:

1. WHEREAS, on August 29, 2024, the Parties appeared before the Honorable Judge Tigar for an Initial Case Management Conference, (ECF No. 66);

2. WHEREAS, on September 9, 2024, the Court ordered the Parties to meet and confer on a proposed protective order and ESI protocol order, and established a schedule and requirements for submitting briefs if Parties could not reach agreement, (ECF No. 68);

3. WHEREAS, the Parties submitted their respective ESI protocol and protective order proposals and accompanying briefs on September 9, 2024, (ECF Nos. 73, 74), and responses and supplemental submissions thereafter (ECF Nos. 75, 76, 79);

4. WHEREAS, on October 21, 2024, the Parties appeared before the Court to present arguments regarding their respective ESI protocols and protective order proposals (ECF No. 80);

5. WHEREAS, the Court directed the Parties to further meet and confer to resolve disputed issues in their respective ESI protocol and protective order proposals, and to submit a stipulation or competing proposals with accompanying briefs by November 4, 2024, (ECF No. 80);

6. WHEREAS, the Parties have engaged in multiple meet and confer conferences and exchanged redlined drafts of the ESI protocol and protective order proposals since October 21, 2024, and have made significant progress toward narrowing the disputed issues in the respective proposals;

7. WHEREAS, the Parties believe that they can make additional progress by continuing to meet and confer on the remaining disputed issues.

NOW, THEREFORE IT IS HEREBY STIPULATED, by and between the Parties and their respective counsel, that the Parties' deadline to submit a stipulation, or competing proposed ESI Protocols, Protective Orders, and supportive briefs not to exceed 5 pages, shall be extended from November 4, 2024, to November 14, 2024.

1 Dated: November 4, 2024

Respectfully submitted,

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1 Dated: November 4, 2024

Respectfully submitted,

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1 Dated: November 4, 2024

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16 *Attorneys for Defendant NVIDIA Corporation*

**~~[PROPOSED]~~ ORDER**

Pursuant to the stipulation of the Parties, and for good cause appearing, it is hereby ORDERED that the Parties deadline for filing a stipulated ESI Protocol and stipulated Protective Order, or filing the Parties' respective proposals and briefs shall be continued to November 14, 2024.

**IT IS SO ORDERED.**

Dated: November 5, 2024



The Honorable Jon S. Tigar  
U.S. District Court Judge

**ATTESTATION PURSUANT TO CIVIL L.R. 5-1**

The filer attests that the other signatories listed, on whose behalf the filing is also submitted, are registered CM/ECF filers and concur in the filing's content and have authorized the filing.

Dated: November 4, 2024

/s/ Bryan L. Clobes

Bryan L. Clobes